

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886

Harold Kaplan (HK0226)

In Re:

**Leonard M Oglesby,
Debtor.**

Case No.: 20-18767-MBK

Chapter: 13

Hearing Date: December 1, 2020

Judge: Michael B Kaplan

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY and CO-DEBTOR
STAY**

HEARING DATE AND TIME:
December 1, 2020 at 9:00 a.m.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor-</i> Leonard M Oglesby 1813 Margerum Avenue Lake Como, NJ 07719 <i>Co-Debtor</i> Gale Lynn Oglesby 1813 Margerum Avenue Lake Como, NJ 07719	<i>Debtor's Attorney-</i> Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107	<i>Trustee-</i> Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650- 4853	<i>U.S. Trustee-</i> U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
--	---	---	---

PLEASE TAKE NOTICE that on December 1, 2020, at 9:00 a.m., or as soon thereafter as counsel may be heard, RAS Citron, LLC, attorneys for NewRez LLC D/B/A Shellpoint Mortgage Servicing, the within creditor ("Creditor"), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at 402 East State Street, Trenton, NJ 08608, Courtroom #8, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay and Co-Debtor Stay pursuant to 11 U.S.C. § 1301 or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, 402 EAST STATE STREET, TRENTON, NJ 08608**, and simultaneously served on Secured Creditor's counsel, **RAS CITRON, LLC, 130 CLINTON ROAD, LOBBY B, SUITE 202, FAIRFIELD, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: 10/30/2020

RAS Citron, LLC

130 Clinton Road, Lobby B, Suite 202

Fairfield, NJ 07004

Telephone: 973-575-0707

Facsimile: 973-404-8886

By: /s/ Harold Kaplan

Harold Kaplan, Esquire

Bar ID: HK0226

Email: hkaplan@rasnj.com